

Palani Karupaiyan et al V Experis it et al	In The US Dist Court of Southern Dist for New York – SDNY Docket# 21-Cv-4675-LGS	
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To
 Hon Judge Lorna G Schofield
 US Dist Court for SDNY

2nd-AMENDED- Motion to Extend the discovery until
 Mar 25 2023 and motion to appoint pro bono attorney
 and other relief.

- 1) Defendants requested plaintiff Deposition on Feb 28 2023.
- 2) Plaintiff requested the defendant Samantha Moore appearance on Mar 1 2023, for which defendants did not responded me.
- 3) This court ordered the discovery be completed by Mar 3 2023.
- 4) On Feb 28 2023, Experis defendant take plaintiff testimony/deposition until 8:40pm? While taking deposition, I was not able to see the exhibits on my phone, so defendant should reschedule on Feb 3 2023. Then I used my laptop to see the exhibits.
- 5) On Feb 28 2023, when the deposition reached until 8:40 Im become ill because only one meal I took for whole day. Deposition is not 100% completed,

gender discrimination, retaliation. US discrimination, less well treated/desperate treatment, favoring foreigner against US Citizen and few more claims' deposition is not completed by defendant.

Due to very long deposition, I become ill.

- 6) During the discovery time, On Feb 21 2023, US Supreme court denied my petition related to parental rights based on forma pauperis. Now Im drafting the Petition for Rehearing with US Supreme court which is another 10 days effort. More importantly, this US Supreme Court parallel docket is waiting for this petition for rehearing.
- 7) By Mar 20 2023, I need to Response the Motion for Summary Judgment of Karupaiyan v. CVS Health in SDNY where CVS did not pay me.
- 8) From above, Experis did not complete the deposition 100%, they need to reschedule to complete their part.
- 9) For my request for Deposition for Ms Moore to appear defendant attorneys said that they were not available for Feb 2 2023 or Feb 3 2023. No response for Feb 1 2023.

10) When I tried to reach the defendants for Mar 3 2023 for deposition defendant attorney replied as below

 Griffith, Lisa M. 6:29 PM (2 hours ago) ☆ ↵ :
to Joseph, me ▾

Dear Mr. Karupaiyan,

We are not available on March 3 as we have another deposition scheduled that day. You will have to seek relief from the court, as discovery ends on March 3. We prefer Zoom, not in-person.

Also, do you have arrangements with a court reporter?

Best,

Lisa M. Griffith
Shareholder
631.247.4709 direct, 631.428.1247mobile, 631.850.5363 fax
LGriffith@littler.com

Download Signature

11) Based on above 2 pleading I will not be take or deposition of Ms Moore before Mar 20 2023.

12) Previously, this court denied appearance of Experis CEO because Defendant Moore should be able to answer the matter instead of Experis CEO.

13) Now the situation that I will not able to take no individual deposition.

14) So plaintiff pray this court to extension the Discovery deadline until Mar 25 2023.

15) Plaintiff is not good in telephonic conversation so inperson is needed. Prose plaintiff does not work

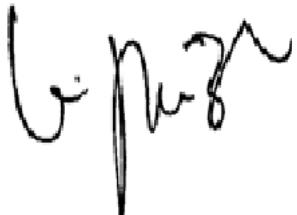
at office as defendant attorneys. So plaintiff pray a place in the court house for taking deposition.

- 16) In the CVS case, I was told that I can use Court house some place for taking deposition and use phone to record the conversation. If possible plaintiff pray this court to arrange the Court reporter.
- 17) In the past when telephonic hearing, plaintiff requested for appoint pro bono attorney, Hon Judge said that during the discovery and trial attorney will be provide.
Without attorney, Im struggling and defendant attorneys were tricking the plaintiff.
- 18) So plaintiff pray this court to i) appoint pro bono attorney and ii) extension the discovery until Mar 25 2023,
iii) place arrangement in court house for taking deposition. When no place in court house, order the defendant attorney's office should accommodate the deposition.s
iv) an reporter to record the deposition.

For any and all reason stated plaintiff pray this court
for 3 weeks stay the case.

Respectfully submitted.

Date: Mar 1 2023.



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Copy to defendant attorney and thru ECF
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